BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, DC 20554

FILED/ACCEPTED JUN 1 9 2008

Federal Communications Commission Office of the Secretary

In the Matter of)	
Fox Television Stations, Inc.)	
KSTU-DT, Salt Lake City, Utah)	
Facility ID No. 22215)	
Digital Television Table of Allotments)	

PETITION FOR RULEMAKING

Fox Television Stations, Inc. ("FTS"), licensee of KSTU-DT, Salt Lake City, Utah, pursuant to Section 1.420 of the Commission's rules, requests that the Commission amend its Digital Television Table of Allotments (the "DTV Table"), 47 CFR § 73.622(i), to substitute channel 28 as the post-transition channel for KSTU-DT in place of channel 13 and to amend Appendix B to the DTV Table to permit the station to serve the public with the maximized facility described in the Engineering Statement attached hereto. KSTU-DT is currently broadcasting on digital channel 28 during the pre-transition period while KSTU-TV is on analog channel 13. As explained below, this amendment to the DTV Table will not cause any new interference and it will result in significant advantages to the public.

MB 08-35

⁴⁷ CFR § 1.420.

FTS files its petition at this time in response to the Commission's Public Notice of May 30, 2008,² which lifted the freeze on the filing of petitions for rulemaking to substitute DTV channels and permitted stations to seek facilities that exceed the parameters in Appendix B.

1. The Proposed Amendment Would Cause No New Interference.

FTS has engaged Smith and Fisher, broadcasting consultants, to conduct an engineering study of the results of operations on a maximized channel 28 post-transition. As explained in the Engineering Statement attached as Exhibit A to this petition, such operation would cause no new interference to the currently authorized post-transition operations of any full-power digital television station or to any Class A LPTV station.

2. The Proposed Amendment Would Enable KSTU-DT to Serve a Larger Audience.

If the Commission grants this petition, FTS intends to increase the station's ERP from the 350 kW at which it now operates to 1,000 kW, enabling it to serve over 6,700 more viewers than it could at the Appendix B parameters. See Exhibit B.³

3. The Proposed Amendment Would Aid in a Smooth Transition to Digital Broadcasting in the Salt Lake City Market.

Optimal reception of digital television stations over-the-air may require different types of antennas for UHF and VHF signals. Viewers who have purchased and installed antennas to

² "Commission Lifts the Freeze on the Filing of Maximization Applications and Petitions for Digital Channel Substitutions, Effective Immediately," DA 08-1213.

Exhibit B is a map comparing the 36 dBu contour of the Appendix B facility on channel 13 and the 41 dBu contour of the proposed maximized facility on channel 28. Although the maximization would not serve sparsely populated areas to the southwest, the loss of an estimated 156 viewers would be more than compensated by the additional homes served in the northern areas.

receive KSTU-DT at 554-560 MHz (UHF channel 28) especially those at considerable distances from FTS's transmitter in the vast Salt Lake City DMA, could receive a less robust signal at 210-216 MHz (VHF channel 13) unless they add a VHF antenna element. The proposed amendment would eliminate that need. Indeed, in the current DTV Table, KSTU-DT is the only station licensed to Salt Lake City that has been assigned a VHF channel. Accordingly, the proposed amendment will benefit over-the-air viewers in Salt Lake City: they need do nothing to continue viewing KSTU-DT with the quality to which they have become accustomed and the transition in February will be that much easier. The proposed amendment may even save viewers the cost of modifying their antennas.

Additionally, because the DTV Table currently assigns to KSTU-DT the channel it is using for analog broadcasts, without the proposed amendment the station would be required to implement a "phased transition" to post-transition digital broadcasting, with the possibility of inconvenience and confusion for the public.⁴ The proposed amendment to the DTV Table would mean that KSTU would only need to cease analog broadcasts on channel 13 to meet the transition deadline.

4. Continuing Broadcasts on Channel 28 Will Save Valuable Resources.

The Commission has noted that broadcast equipment manufacturers, suppliers, and installation personnel will be struggling to meet the demands of broadcasters that need new products and services in preparation for the digital transition next February.⁵ The proposal that

See Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, 23 FCC Rcd. 2994, ¶ 88 et. seq.

⁵ See, e.g., Id., ¶ 72.

FTS makes in this petition would permit KSTU-DT to meet the transition without using such additional resources, leaving them available for other broadcasters.

5. Conclusion.

FTS proposes an amendment to the DTV Table of Allotments that would permit KSTU-DT to continue operating permanently on its pre-transition channel, 28. This amendment, along with the maximization that FTS is prepared to implement, will provide improved service and convenience to the public and will result in the preservation of valuable resources. Accordingly, FTS requests that the Commission grant this petition.

Respectfully submitted,

FOX TELEVISION STATIONS, INC.

Bv:

Dianne Smith Vice President FOX TELEVISION STATIONS, INC. 5151 Wisconsin Avenue, N.W. Washington, D.C. 20016 (202) 895-3088 Antoinette C. Bush David H. Pawlik Jared S. Sher SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP 1440 New York Avenue, N.W. Washington, D.C. 20005 (202) 371-7000

Its Attorneys

Dated: June 19, 2008

Fox Television Stations, Inc. KSTU-DT, Salt Lake City, Utah Facility ID No. 22215 Digital Television Table of Allotments

Exhibit A

Engineering Statement

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of FOX TELEVISION STATIONS, INC., licensee of KSTU-DT on Channel 28 in Salt Lake City, Utah, in support of its Petition for Rulemaking to substitute Channel 28 for Channel 13 in the Commission's Digital Television Table of Allotments for post-transition operation. The proposed channel is currently the licensed digital channel for KSTU-DT. If the Petition is granted, the station will simply increase the effective radiated power of the licensed digital facility at the existing site, using the presently licensed digital antenna pattern.

Attached is the engineering portion of an FCC application for the proposed facility. In it, the operating parameters of the station are provided. As shown in the engineering report, operation on the new channel with the specified parameters will result in a facility that places the requisite city-grade contour over the city of license, meets the FCC's interference requirements to all post-transition DTV facilities (and Class A LPTV stations), and satisfies the Commission's human exposure guidelines to nonionizing electromagnetic radiation.

Accordingly, it is respectfully requested that the Commission substitute the allotment channel for KSTU-DT (with the specified operating parameters) in the digital television allotment table in Section 73.622(i) of the FCC Rules as follows:

Present Allotment

Proposed Allotment

Salt Lake City, UT 13, 20, 34, 38, 40, *42, 46

Salt Lake City, UT 20, 28, 34, 38, 40, *42, 46

I declare, under penalty of perjury, that the foregoing statements and attached engineering report, which was prepared by me, is true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

June 17, 2008

Section III - D - DTV Engineering

Complete Questions 1-5 and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.

Pre-Transition Certification Checklist: An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to modify pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

Post-Transition Expedited Processing. An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed on or before March 17, 2008 (45 days of the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91).

1.	The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:	
	(a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622.	Yes X No
	(b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 mil the DTV reference site for this station as established in 47 C.F.R. Section 73.622.	es) of X Yes No
	(c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as establin 47 C.F.R. Section 73.622.	
	(d) It will operate at post-transition facilities that do not expand the noise-limited service contours any direction beyond that established by Appendix B of the Seventh Report and Order in MB D No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Appendix B").	ocket N/A
•	• (e) It will operate at post-transition facilities that match or reduce by no more than five percent with reto predicted population from those defined in the DTV Table Appendix B.	espect X Yes No
2.	The proposed facility will not have a significant environmental impact, including exposure of workers general public to levels of RF radiation exceeding the applicable health and safety guidelines, and there will not come within 47 C.F.R. Section 1.1307.	
	Applicant must submit the Exhibit called for in Item 13.	
3.	Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompare allotted principal community.	ss the X Yes No
4.	The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, receiving installations and FCC monitoring stations have either been satisfied or are not applicable.	radio X Yes No
5.	The antenna structure to be used by this facility has been registered by the Commission and will not re reregistration to support the proposed antenna, OR the FAA has previously determined that the prostructure will not adversely effect safety in air navigation and this structure qualifies for later regist under the Commission's phased registration plan, OR the proposed installation on this structure document notification to the FAA pursuant to 47 C.F.R. Section 17.7.	posed ration

SECTION III-D DTV Engineering

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1.	Channel Number: DTV 28	Analog TV, if any	13					
2.	Zone:	In Im						
3.	Antenna Location Coordinates: (NA	AD 27)						
	<u>40 ° 39</u>	<u>. 33 ∗ ∑</u> N	S Latitude					
	<u>112 · 12</u>	<u>' 08</u> " □E	XW Longitud	ie				
4.	Antenna Structure Registration Num	nber:						
	Not applicable	FAA Noti	fication Filed with	ı FAA				
5.	Antenna Location Site Elevation Al	oove Mean Sea Level:		2,733.3	meters			
6,	Overall Tower Height Above Groun	d Level:		55.5	meters			
7.	Height of Radiation Center Above (Fround Level:		51.2	meters			
8.	Height of Radiation Center Above A	1,210	meters					
9.	Maximum Effective Radiated Power	1,000	kW					
10.	Antenna Specifications:							
	Manufacturer	Model						
	a Dielectric		12JTH-R CT	220				
	b. Electrical Beam Tilt:	1.5 degrees	□N	ot Applicable				
	c. Mechanical Beam Tilt:	degrees toward az	imuth	degrees True	X Not Applicable			
	Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). Exhibit No. B							
	d. Polarization:	zontal	Circular		Blliptical			

Directional					• •	(Nondirect	ional)			,
Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0,972	60	0.568	120	0.570	180	0.996	240	0.173	300	0.143
1.000	70	0.583	130	0.583	190	0.945	250	0.157	310	0.224
0.967	80	0.633	140	0.675	200	0.840	260	0.228	320	0.396
0.878	90	0.655	150	0.804	210	0.690	270	0.272	330	0.584
0.751	100	0.656	160	0.920	220	0.510	280	0.261	340	0.755
0.630	110	0.613	170	0.988	230	0.323	290	0.199	350	0.888
the proposed face as an Exh	ed facility ? (Applicate s an Exhibit waivers. ility will note ibit justific	satisfy the ble only if bit justificat	Certification therefore coverage	on Checkl or, includin	ist Items I	(a), (b), or ary of any R. Section	(c) are related	Exhibit D Exhibit C]No No.	
Certification vironmental ill be taken to the tower sit checking "3 coordination protect pers	n Checkli Assessme limit RF re e. Yes" to Cen with other sons havin	ist Item 2 is not readiation experience of the gaccess to	s answered answered answered to the consure to the consument of the consum	d "Yes," a so describe te public and tem 2, the a duce power tower or a	brief explain the Extended to person applicant a crease open	hibit the ste s authorized lso certifies eration as ne	eps that I access that it, eccessary	Exhibit E	No.	
	Value 0.972 1.000 0.967 0.878 0.751 0.630 all is directional a st be satisfied with the proposed face in as an Exhibit a	Value Degree 0.972 60 1.000 70 0.967 80 0.878 90 0.751 100 0.630 110 all ss directional antenna is part be satisfied. Exhibit and the proposed facility on 73.623(a)? (Applicated "No.") fo," attach as an Exhibit substituted as an Exhibit justified is an exhibit justified in a san Exhibit justified is an exhibit justified in a san exhibit justified is an exhibit justified in exhibit justified in exhibit justified is an exhibit justified in exhibit justified	Value Degree Value 0.972 60 0.568 1.000 70 0.583 0.967 80 0.633 0.878 90 0.655 0.751 100 0.656 0.630 110 0.613 all is directional antenna is proposed, the state satisfied. Exhibit required. the proposed facility satisfy the on 73.623(a)? (Applicable only if ered "No.") fo," attach as an Exhibit justification usily granted waivers. proposed facility will not satisfy the as an Exhibit justification there is an exhibit justification expectively checking "Yes" to Certification expecting the tower site.	0.972 60 0.568 120 1.000 70 0.583 130 0.967 80 0.633 140 0.878 90 0.655 150 0.751 100 0.656 160 0.630 110 0.613 170 all is directional antenna is proposed, the requirement of the satisfied. Exhibit required. the proposed facility satisfy the interference on 73.623(a)? (Applicable only if Certification of Wall of W	Notation: Value Degree Value Degree Value	Rotation: Value Degree Value Degree Value Degree 0.972 60 0.568 120 0.570 180 1.000 70 0.583 130 0.583 190 0.967 80 0.633 140 0.675 200 0.878 90 0.655 150 0.804 210 0.751 100 0.656 160 0.920 220 0.630 110 0.613 170 0.988 230 all states and set of the statistic of the requirements of 47 C.F.R. Sect of the satisfied. Exhibit required. The proposed facility satisfy the interference protection provision 73.623(a)? (Applicable only if Certification Checklist Items 1 as an Exhibit justification therefor, including a summously granted waivers. Proposed facility will not satisfy the coverage requirement of 47 C.F. as an Exhibit justification therefor. (Applicable only if Certification Checklist Item 2 is answered "Yes," a brief explanation of the proposed in the Exhibit the following: Certification Checklist Item 2 is answered "Yes," a brief explanation of the public and to person the tower site. The coordination with other users of the site, will reduce power or cease operation of the coordination with other users of the site, will reduce power or cease operation.	Rotation: Value Degree Value Degree Value Degree Value	Rotation: Simple No rotation Value Degree Value Degree Value Degree Value Degree 0.972 60 0.568 120 0.570 180 0.996 240 1.000 70 0.583 130 0.583 190 0.945 250 0.967 80 0.633 140 0.675 200 0.840 260 0.878 90 0.655 150 0.804 210 0.690 270 0.751 100 0.656 160 0.920 220 0.510 280 0.630 110 0.613 170 0.988 230 0.323 290 all states and statisfy the interference protection provisions of 47 C.F.R. on 73.623(a)? (Applicable only if Certification Checklist Items 1(a), (b), or (c) are ered "No.") 10, at a san Exhibit justification therefor, including a summary of any related ously granted waivers. 10 certification Checklist Item 2 is answered "Yes," a brief explanation of why an anyironmental Protection Act. Submit in an Exhibit the following: 11 Certification Checklist Item 2 is answered "Yes," a brief explanation of why an anyironmental Assessment is not required. Also describe in the Exhibit the steps that ill be taken to limit RF radiation exposure to the public and to persons authorized access	No rotation No page Value Degree Degree	No rotation No rotation

PREPARER'S CERTIFICATION IN SECTION III MUST BE COMPLETED AND SIGNED.

If Certification Checklist Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

13. Petition for Rulemaking/Counterproposal to A Allotments. If the application is being submit Rulemaking or Counterproposal to Amend the FM 73.202) to add a new FM channel allotment, petitis the FM channel allotment requested is allotted, per participate in the auction of the channel allotment results.	itted concurrently with a Petition for M Table of Allotments (47 C.F.R. Section ioner/counter-proponent certifies that, if etitioner/counter-proponent will apply to
good faith. I acknowledge that all certifications and attact to the use of any particular frequency as against the re-	complete, and correct to the best of my knowledge and belief, and are made in ched Exhibits are considered material representations. I hereby waive any claim egulatory power of the United States because of the previous use of the same tion in accordance with this application. (See Section 304 of the Communications
Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date
(U.S. CODE, TITLE 18, SECTION 1001), AND/OR R (U.S. CODE, TITLE 47, SECTION 312(a)(1 SECTION III I certify that I have prepared Section III (Engineering D	S FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503). I PREPARER'S CERTIFICATION (2) On behalf of the applicant, and that after such preparation, I have
examined and found it to be accurate and true to the bes	st of my knowledge and belief.
Name KEVIN T. FISHER Signature	Relationship to Applicant (e.g., Consulting Engineer) Broadcast Consultant Date
Mailing Address	June 17, 2008
SMITH and FISHER, 2237 Tackett'	's Mill Drive, Suite A
City Lake Ridge	State or Country (if foreign address) Virginia ZIP Code 22191
Telephone Number (include area code)	E-Mail Address (if available)
(703) 494-2101	 Kevin@smithandfisher.com
	S FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT

(U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of FOX TELEVISION STATIONS, INC., licensee of KSTU-DT, Channel 28 in Salt Lake City, Utah, in support of its Application for Construction Permit to operate with a maximized post-transition DTV facility on Channel 28. This application specifies the same operating parameters as those in the station's Petition for Rulemaking to change the allotted DTV channel from Channel 13 to Channel 28.

It is proposed to utilize the present Dielectric directional antenna which is mounted at the 51-meter level of an existing 56-meter tower. Exhibit B provides elevation and azimuth pattern data for the licensed antenna. Exhibit C is a map upon which the predicted service contours are plotted. As shown, the city of license is completely contained within the proposed 48 dBu service contour. An interference study is included in Exhibit D, and it is important to note that the study utilized a cell size of 2.0 kilometers and an increment spacing of 1.0 kilometers. A power density calculation is provided in Exhibit E.

It is important to note that, while the proposed effective radiated power of 1000 kw exceeds that allowable in Section 73.622(f)(8)(i) of the Commission's Rules, the coverage of the facility proposed herein does not exceed that of the largest station in the market (KSL-DT, Channel 38 in Salt Lake City, Utah), as allowed in Section 73.622(f)(5) of the Rules.

It is not expected that the proposed facility would cause objectionable interference to any other broadcast or non-broadcast station authorized to operate at or near the KSTU-DT site.

EXHIBIT A

However, if such should occur, the owner of this station recognizes its obligation to take whatever corrective actions are necessary.

Since no change in overall height or location of the existing tower is proposed herein, the FAA has not been notified of this application. Due to the diminutive height of the tower and its proximity to the nearest airport runway, FCC antenna structure registration is not required.

This conclusion is supported by the Commission's TOWAIR Program.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

June 17, 2008



Proposal Number

Date

DCA-10833 30-Mar-05

Revision:

Call Letters

KSTU-DT

Channel

28

Location Customer Salt Lake City, UT

Antenna Type

TFU-12JTH-R CT220

ELEVATION PATTERN

RMS Gain at Main Lobe RMS Gain at Horizontal 12.73 9.00

(11.05 dB)

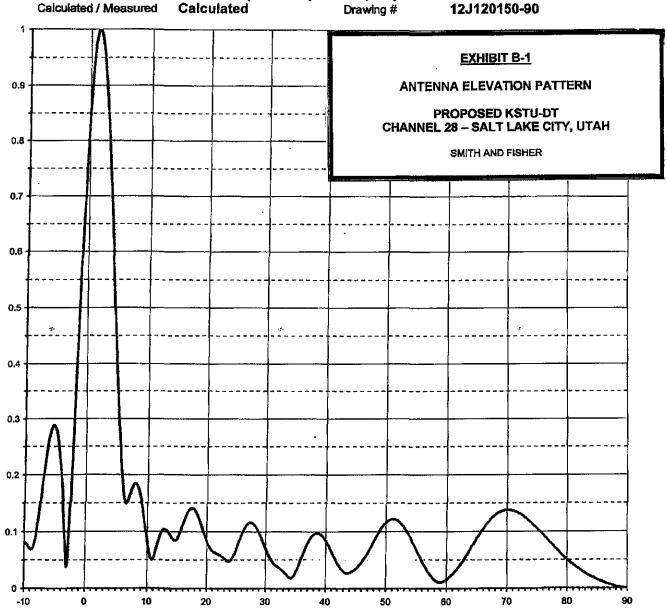
(9.54 dB)

Beam Tilt

Frequency Drawing #

1.50 deg

557.00 MHz 12J120150-90



Degrees Below Horizontal



Proposal Number

Date

Call Letters

Location

Customer Antenna Type DCA-10833

Revision:

30-Mar-05

KSTU-DT Channel 28

1

Salt Lake City, UT

TFU-12JTH-R CT220

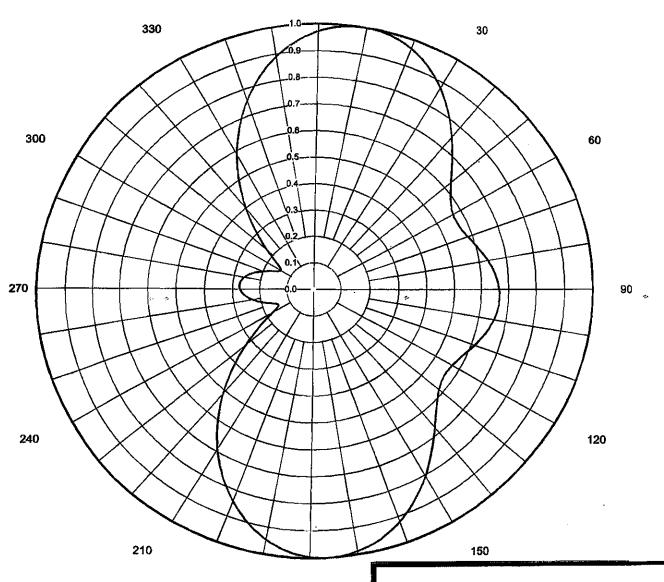
AZIMUTH PATTERN

Gain

2.20 Calculated / Measured (3.42 dB) Calculated Frequency Drawing #

557.00 MHz TFU-CT220

0



180

EXHIBIT B-2

ANTENNA AZIMUTH PATTERN

PROPOSED KSTU-DT CHANNEL 28 - SALT LAKE CITY, UTAH

SMITH AND FISHER

EXHIBIT B-3

ANTENNA AZIMUTH PATTERN DATA

PROPOSED KSTU-DT CHANNEL 28 – SALT LAKE CITY, UTAH

Azimuth _(° T)	Relative Field	ERP (dbk)	Azimut <u>(° T)</u>	h Relative <u>Field</u>	ERP (dbk)
0	0.972	29.8	180	0.996	30.0
10	1.000	30.0	190	0.945	29.5
20	0.967	29.7	200	0.840	28.5
30	0.878	28.9	210	0.690	26.8
40	0.751	27.5	220	0.510	24.2
50	0.630	26.0	230	0.323	20.2
60	0.568	25.1	240	0.173	14.8
70	0.583	25.3	250	0.157	13.9
80	0.633	26.0	260	0.228	17.2
90	0.655	26.3	270	0.272	18.7
100	0.656	26.3	280	0.261	18.3
110	0.613	25.7	290	0.199	16.0
120	0.570	25.1	300	0.143	13.1
130	0.583	25.3	310	0.224	17.0
140	0.675	26.6	320	0.396	22.0
150	0.804	28.1	330	0.584	25.3
160	0.920	29.3	340	0.755	27.6
170	0.988	29.9	350	0.888	29.0

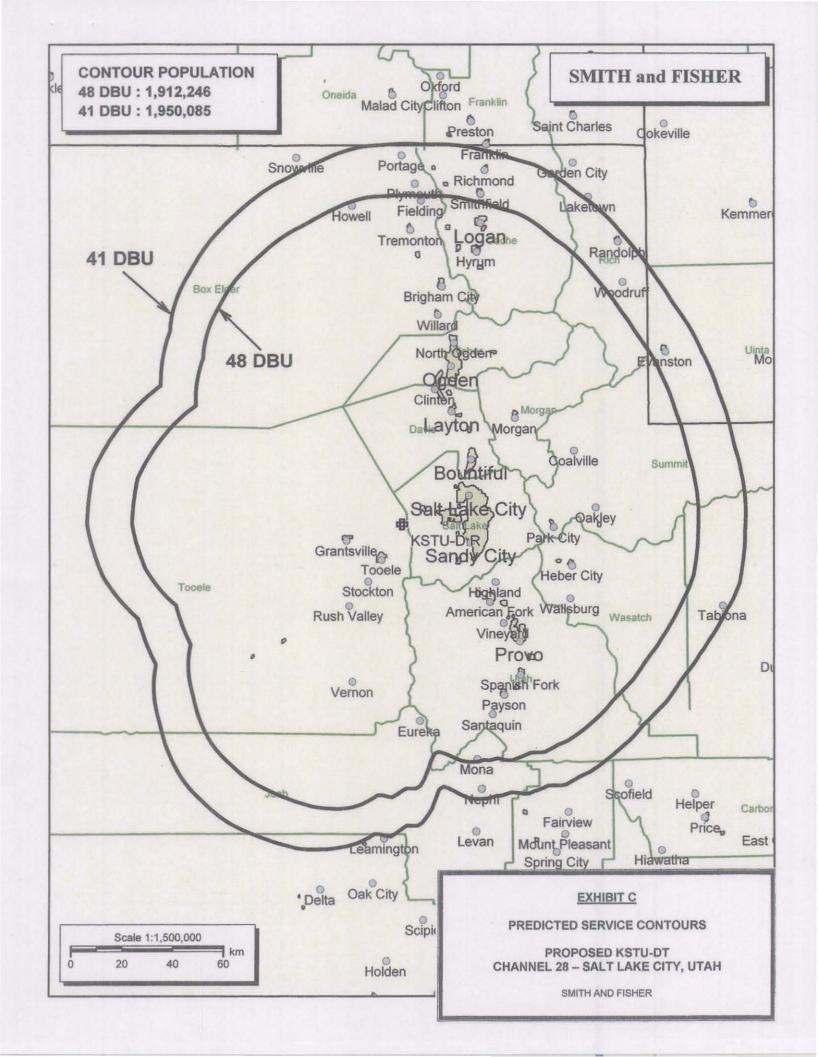


EXHIBIT D-1

INTERFERENCE STUDY

PROPOSED KSTU-DT CHANNEL 28 – SALT LAKE CITY, UTAH

The instant application specifies an ERP of 1000 kw (omnidirectional) at 1,210 meters above average terrain, which we have determined to be allowable under the FCC's recently approved interference standards with respect to various post-transition digital television facilities as they will exist on or before February 17, 2009, the date by which all stations must operate with the parameters recently adopted in the Commission's DTV Table of Allotments.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe III" computer program, which has been found generally to mimic the FCC's program. In conducting our studies, we employed a cell size of 2.0 kilometers and an increment spacing of 1.0 kilometer along each radial. In addition, we utilized the 2000 U.S. Census. Changes in interference caused by proposed KSTU-DT to other pertinent stations are tabulated in Exhibit D-2.

As shown, the proposed KSTU-DT facility would not contribute more than 0.5% interference (beyond that which is caused by the allotted KSTU-DT facility) to the service population of any potentially affected post-transition DTV station.

A Longley-Rice interference study also reveals that the proposed KSTU-DT facility does not cause significant (0.5%) interference within the protected service contour of any potentially affected Class A low power television station.

Therefore, this proposal meets the FCC's *de minimis* interference standards for DTV operations.

EXHIBIT D-2

INTERFERENCE STUDY SUMMARY

PROPOSED KSTU-DT CHANNEL 28 – SALT LAKE CITY, UTAH

<u>Call Sign</u>	<u>Çity, State</u>	<u>СН.</u>	Coverage Population	Interference Population From KSTU-DT*	<u>%</u>
KUPX-DT	Provo, UT	29	1,787,541	386	<0.1

Note: This study utilized a cell size of 2.0 km and an increment spacing of 1.0 km.

^{*}Above that caused by the allotment facility.

EXHIBIT E

POWER DENSITY CALCULATION

PROPOSED KSTU-DT CHANNEL 28 – SALT LAKE CITY, UTAH

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Salt Lake City facility. Employing the methods set forth in *OET Bulletin No.* 65 and considering a main-lobe effective radiated power of 1000 kw, an antenna radiation center 51.2 meters above ground, and the elevation pattern of the Dielectric antenna, maximum power density two meters above ground of 0.23 mw/cm² is calculated to occur 17 meters north and south of the base of the tower. Since this is only 12.7 percent of the 1.85 mw/cm² reference for controlled environments (areas without public access) surrounding a facility operating on Channel 28 (554-560 MHz), and since this site is secure from unauthorized access, a grant of this proposal may be considered a minor environmental action with respect to public and occupational ground-level exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna or on nearby towers will not be exposed to excessive nonionizing radiation.

..

Fox Television Stations, Inc. KSTU-DT, Salt Lake City, Utah Facility ID No. 22215 Digital Television Table of Allotments

Exhibit B

